UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

In re:	Kenneth Harry Clark Jr.) Case Number 19-13850
) Chapter 13 Proceedings
	Debtor(s).) Judge Arthur I. Harris

TRUSTEE'S OBJECTION TO MOTION TO MODIFY PLAN

Now comes **LAUREN A. HELBLING**, the duly appointed and qualified Standing Chapter 13 Trustee ("Trustee") herein, and hereby objects to the Debtor's Motion to Modify Plan filed with this Court on February 4, 2022 (hereinafter "Debtor's Motion"). In support of this objection, the Trustee makes the following representations to the Court:

- 1. Debtor has failed to file an amended budget and provide the Trustee with verification of income, such as recent pay advices and a 2021 W-2 showing how Debtor can afford the increase in plan payment.
- 2. Part 3.4 of the Amended Plan has been calculated incorrectly; therefore, the Trustee cannot determine treatment of these claims.
- 3. The Debtor has completed the third section of Part 5.1. As the Northern District of Ohio (Cleveland) is not a "pot plan" jurisdiction, this section should not be completed.
- 4. The Trustee reserves the right to amend and/or supplement her objection should additional information be provided.

WHEREFORE your Trustee, being a proper party in interest, hereby moves this Honorable Court to deny the Debtor's Motion for the reasons cited.

Respectfully submitted,

/S/ Lauren A. Helbling

LAUREN A. HELBLING (#0038934) Chapter 13 Trustee 200 Public Square, Suite 3860 Cleveland OH 44114-2321 Phone (216) 621-4268 Fax (216) 621-4806 ch13trustee@ch13cleve.com

CERTIFICATE OF SERVICE

I certify that on February 9, 2022, a true and correct copy of the Trustee's Objection was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

William Balena, Attorney, on behalf of Debtor(s) at docket@ohbksource.com

/S/ Lauren A. Helbling

LAUREN A. HELBLING (#0038934) Chapter 13 Trustee 200 Public Square, Suite 3860 Cleveland OH 44114-2321 Phone (216) 621-4268 Fax (216) 621-4806 ch13trustee@ch13cleve.com